

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
ED-2020-SCC-0122-0005	Conny Bax (cbax@westshore.edu)	My question relates to clarification on using institution funds. We have not had any formal security at our college in the past. With the introduction of the pandemic, it became clear that we needed to move forward on this. We are engaging in a security service with a police department in the neighboring city. They will provide a uniformed officer weekdays and during any events. Because we are rural, this individual will require a police car. We are agreeing to pay for this to ensure the best safety of our faculty students, and staff. We are hoping that this will be an allowable use of the HEERF funds. In addition, we operate an ice arena and recreation center that have been closed since the inception of the pandemic. We understand that lost revenues are not necessarily an allowable use of funds, however, there is significant upkeep required to operate a pool and an ice arena - even when they are not in use. We have lowered our expenses as significantly as possible, but we cannot recoup all with no revenue. Would this be an allowable use of HEERF funds? Finally, we have a nursing and safety program, both train and educate individuals become nursing staff and security/policing staff. We had to continue our education learning for these specific courses due to the emergent need of these individuals. We are planning to include them in our use of institutional HEERF funds. Please advise if this is allowable.	The comment is not relevant to the information collection at issue and will be considered separately by the Department.
ED-2020-SCC-0122-0007	Peter Goss	<p>1) While it would be qualitative rather than quantitative, and thus harder to compile, I think it may make sense to include an additional open text box for schools to optionally add comments/clarification on any of the questions asked.</p> <p>2) In question 3 I would ask for clarification specifically around the "enrollment intensity" piece, since that's not standard nomenclature. Many institutions required students to be enrolled in some fashion to be eligible, but not necessarily full time vs. part time. I assume in that case the answer would still be no? I think it would help to clarify the intent there.</p> <p>3) In question 4 I suspect many schools will have used multiple methods. Question 2 allows for 'select all that apply' and that would seem necessary here as well.</p> <p>4) Question 5 is a bit unclear as well. Does it refer specifically to guidance on how to apply, or to any disclosures the school may have made about disbursement or award determination (we created a FAQ, for example)? If the latter, I guess I would assume that applies to all institutions. The other wrinkle here is that schools may have done more than one HEERF disbursement, and if those communications were done via URL, the URL may well be current to only reflect the most recent round of awarding/updates. Without having been told in advance to archive those, there may well be gaps here.</p> <p>5) I think Question 8 will need some more clarity either in the question or instructions. "(withdrawal without a completion record since receiving funds)?" Say a student withdrew from spring quarter/semester, but subsequently completed summer or fall. I read that to say that I would NOT report that student as withdrawn, but I'm not highly confident in that assessment, especially as those terms fall outside the designated "reporting period."</p>	<p>1) Institutional respondents now can add explanatory notes and comments on question 9 of the revised form. However, ED believes adding comments/clarifications will significantly increase burden for institutional respondents.</p> <p>2) ED clarified "enrollment intensity" in question 5 of the revised form to include number of credits that the student is taking.</p> <p>3) Question 6 of the revised form allows for schools to mark multiple methods.</p> <p>4) ED clarified question 7 of the revised form to include FAQs created by the IHE and other information on how to use the funds.</p> <p>5) ED changed question 10 of the revised form based on other public comments received and added clarification around reporting student withdrawals</p>
ED-2020-SCC-0122-0008	Peter Goss	1) Thinking through Question/Table #6, I think the logic makes sense in the context of an institution making a single set of disbursements in any given reporting year. Some of it starts to become more convoluted though in a scenario where an institution were to make multiple rounds of disbursements within a single reporting year, and that seems to me to be true for all of the data items that you start introducing bad data or errors. Even in the simplest scenario, for example, a	1) ED acknowledges that institutions may choose to make HEERF Emergency Grant disbursements at different times. The institution should designate the students' Pell or enrollment status based their status at time of the first HEERF Emergency

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Response to 60-Day Public Comments**

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		<p>student may be a full-time Pell recipient receiving HEERF funds in summer, and a part-time non-Pell student receiving HEERF funds in Fall. The instructions appear to refer to using the "enrollment intensity" at the time of disbursement, but here you have multiple disbursements of both HEERF and Title IV funds, and it's not clear which you would use. The footnote that refers to FAQ#9 doesn't seem to address this scenario at all.</p> <p>2) I may have missed it, but is it stated somewhere that institutions would only file this for a given reporting year if they had expenditures in that year?</p> <p>3) As is typical, I would say that the estimated burden of this reporting (1.5 hours per institution) appears to be significantly underestimated. Writing the queries, collecting information from multiple departments, validating the data, and input/submission will likely be several times the assumed amount. For my institution I expect it will fall into the ballpark of 8-15 total staff hours to prepare and submit this for the first reporting year, and likely 4-10 for subsequent reports.</p>	<p>Grant disbursement. ED clarified the definition of enrollment intensity this refers to the first disbursement of a student's HEERF emergency grant. ED has replaced the footnote reference to FAQ #9 with guidance.</p> <p>2) Institutions are expected to file a report each year. However, institutions will be expected to indicate to ED that there were expenditures in the reporting period.</p> <p>3) In recognition of the additional burden highlighted by public comment, ED has increased the burden estimate to 6 hours per institution.</p>
ED-2020-SCC-0122-0009	Michael Putch, Micheal.putch1122@Gmail.com	How can I apply for funding for my children?	This comment is not relevant to this collection" or similar since the HEERF program is not something individuals can apply to the Department for and receive.
ED-2020-SCC-0122-0011	BJ King, ETSU, kingbj@etsu.edu	It would be good to have a category for reporting cancelled travel for students, faculty and staff. Study abroad was cancelled and there were costs refunded outside of tuition and fees when students or faculty could not get a refund for pre-paid items. Also, staff had travel changes due to cancelled conferences. Some prepayment were not refunded to the employee for the travel and were reimbursed by the institution.	If this is a substantial cost for a particular institution, ED recommends that the institution indicate and tabulate this cost in the "other" category.
ED-2020-SCC-0122-0012	<b>Anonymous</b>	<p>What is the purpose in requiring reports for 2 years when institutions of higher education are required to spend the funds within one year of the award? In the case of my institution, all HEERF funds we have been awarded are required to be spent out by August 2021 and yet we will be required to report on them for another year.</p> <p>Also - the time to report on this is grossly underestimated. It does not account for new tracking systems being put in place and the categories as outlined on the data collection sheet either do not align with typical budget categories and/or require a greater level of detail than normal reporting.</p>	<p>There is a performance period for HEERF funds of 1 year. However, ED has stated that for the HEERF grants, no-cost extensions (NCEs) of up to 12 months are available as provided for in 2 CFR § 200.308(d)(2). NCEs may not be exercised merely for the purpose of using unobligated balances. Given the emergency nature of HEERF grants, the Department does not intend an NCE to extend longer than 12 months. HEERF grantees are encouraged to discuss any need for an NCE with their respective program officer well in advance of the end of their grant period of performance. Furthermore, ED has modified the reporting period to be due on February 1<sup>st</sup> each year for previous calendar year expenditures and has also added a question asking if the institution has expended all of their HEERF funds (in which case they will not be expected to complete subsequent annual reports).</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

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			<p>Institutions can expend HEERF funds in subsequent years. There is no requirement placed on institutions to exhaust funds within one year.</p> <p>ED acknowledges that systems may not be in place to report this data and that retrieving the data takes time and adds burden. However, it is important for grantees to report information regarding the early implementation of HEERF to inform the Department's monitoring and technical assistance and to provide transparency to the public about uses of the HEERF funds. Some public comments called for additional burden, others suggested the burden was too high. In recognition of the additional burden highlighted by public comment, ED has increased the burden estimate to 6 hours per institution.</p>
<p><b>Document:</b> ED-2020-SCC-0122-0013</p>	<p><b>Email:</b> welchb18@ecu.edu <b>Organization:</b> East Carolina University</p>	<p>Under #7 on both versions, there are two boxes that state "Replacing lost tuition revenue due to reduced enrollments" and "Replacing lost revenue from non-tuition sources". The beginning of #7 does state that this template is meant to serve as a guide, so not all categories will be applicable to every institution but I do think that if a particular line is NOT allowed by certain types of Universities, then this should be stated as a note at the least so as to not give the impression that our university could have chosen this option. Based on past communications, we believe that we can NOT use the institutional funds to replace anything but housing and dining REFUNDS, not revenue loss. Revenue loss was limited to certain institution types which we do not fall under. If we are allowed, we need to know this sooner rather than later. If we are correct and not allowed, then these lines should have a note stating which universities this would pertain to. Something to make it clear that this was not necessarily an allowed use of funds for all universities.</p>	<p>ED has updated the table to include appropriate grayed out areas, please note this in both the new annual form and the <a href="#">final quarterly reporting form</a>. While some items in the chart are blocked out, please note that the blocking of such items is consistent with Department guidance and FAQs and is not definitive.</p>
<p><b>Document:</b> ED-2020-SCC-0122-0014</p>	<p><b>Email:</b> cta@northgatech.edu <b>Government Agency Type:</b> State <b>Government Agency:</b> North Georgia Technical College</p>	<p>Item #1.c.: Institutions of higher education (IHEs) that have more than one disbursements would be able to provide the URL to show that they published the required reports, but the URL would show only the most recent report (not the 30-day report). For example: An IHE had 3 disbursements and published them per the schedule specified in the May 6, 2020, Electronic Announcement: May 15, 2020 (30-day report), June 29th (next 45-day report), Aug 13th (next 45-day report). The URL would reflect only the Aug 13th report, which is the most recent one. During the USDOE technical assistance webinar on June 23rd, they did not advise IHEs to archive the URLs of prior reports. They only stated that USDOE staff are checking each grantee's website.</p> <p>Item #6: Some IHEs, especially small public-funded ones, do not collect the level of detail about students that the table seeks. For example: the table asks for a breakdown of the full-time students who are Pell Grant recipients and the non-</p>	<p>ED updated the data collection to request any active URLs including those that may have archived information in question 3 of the revised form.</p> <p>ED acknowledges that systems may not be in place to report this data and that retrieving the data takes time and adds</p>

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Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>Pell Grant recipients, as well as the part time students. As a public-funded two-year IHE, we do not collect that level of student detail. The state’s data management system does collect the number of students who were in a Pell eligible program. However, that does not necessarily mean that they received Pell assistance nor does the state’s data management system break the Pell data down by part time versus full time students. The colleges would have to compile the state data from two different reports and manually sort each data set. To do so would burden the colleges. We estimate the average burden hours per response for Item #6 would be a minimum of 20 hours for the college to manually compile the data in addition to the data support that the state system would provide.</p> <p>Item #8: Some IHEs, especially small two-year colleges, lack the capacity to retrieve the level of detail about students that the table seeks. The table asks for the number of “students who ever received HEERF Emergency Financial Aid Grants dropped out (withdrawal without a completion record since receiving funds and the withdrawal rate). Many students at two-year IHEs are older than the average student at four-year IHEs; the average student age at our college is 26. Many have young families, work full time to support them, and take classes whenever they can. For example, a student may start in the fall semester, “sit out” the spring semester to work and resume classes in the summer or the following fall. Without contacting the student directly, the college would not know whether he/she has withdrawn from the program or merely sitting out a semester to work. To do so would burden two-year colleges. We estimate the average burden hours per response for Item #8 would be 10 hours for the college to manually compile the data.</p>	<p>burden. However, it is important for grantees to report information regarding the early implementation of HEERF to inform the Department’s monitoring and technical assistance and to provide transparency to the public about uses of the HEERF funds. Some public comments called for additional burden, others suggested the burden was too high. In recognition of the additional burden highlighted by public comment, ED has increased the burden estimate to 6 hours per institution.</p>
<p><b>Document:</b> ED-2020-SCC-0122-0015</p>	<p><b>Name:</b> Melissa Pantier</p>	<p>We would like to see clarification of question #9 in both versions regarding the definition of "FTE positions." Does this mean full-time equivalent employees at the institution (excluding student workers), or FTE employees including student workers, or FTE student workers only, or FTE students enrolled at the institution?</p> <p>We feel that the burden is underestimated, especially regarding the time and effort needed to identify whether students in #8 who "withdrew after receiving emergency financial aid grants" will return to the institution at some point. We have some students who chose not to enroll this semester because the athletics program is paused due to COVID-19, who plan to return in the spring semester if athletics are allowed to resume. We will have to interview each student who has withdrawn to determine their status.</p>	<p>ED acknowledges the need for clarification in the question about Full-Time Equivalent (FTE) Positions. ED has revised the instructions for question 11 of the revised form to now read, “(The number of FTE positions includes all staff regardless of whether the position is funded by Federal, State, local, or other funds—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.)”</p> <p>ED acknowledges that systems may not be in place to report this data and that retrieving the data takes time and adds burden. However, it is important for grantees to report information regarding the early implementation of HEERF to inform the Department’s monitoring and technical assistance and to provide transparency to the public about uses of the HEERF funds. Some public comments called for additional</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
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<b>Document:</b> ED-2020-SCC-0122-0017	<b>Organization:</b> Concordia University Texas	Q8 - How does ED define withdrawal? Leaving during the semester, not returning after summer, etc.? Q9 - How is this question relevant to this funding? (Whereas the PPP directly relates to employment.)	ED has updated the definition of “withdrawal” to indicate withdrawal without subsequent return by the end of the reporting period.  Question 10 in the revised form addresses reporting requirements under Section 15011 of the CARES Act.
<b>Document:</b> ED-2020-SCC-0122-0018	<b>Name:</b> Anonymous <b>Submitter's Representative:</b> Jill Desjean <b>Organization:</b> National Association of Student Financial Aid Administrators	<p>Question 2(a) asks if institutions used a valid ISIR to establish student eligibility for CARES Act funding. ED has never specified that, if institutions choose to use the ISIR to confirm student eligibility, that the ISIR must be valid. There are many reasons an ISIR could be considered invalid while the student may still have passed the database matches confirming that they meet the student eligibility requirements in HEA section 484. For this reason we recommend removing the word "valid".</p> <p>Question 6, table row 1 asks, “How many students were eligible to receive HEERF emergency grants made available under section 18004 of the CARES Act?”, and includes a footnote referring to ED’s April 21, 2020 Frequently Asked Questions document, where ED announced student eligibility requirements that included meeting the Title IV eligibility criteria under HEA Section 484 and excluding distance education students. However, since ED has, subsequent to the publication of this comment request, provided a methodology for calculating this figure in a footnote to the August 31 revision to its May 6 Electronic Announcement, we suggest that ED remove the reference to the April 21 FAQ and substitute the August 31 methodology in its place. This would provide a consistent methodology for calculating this figure across all data collections, would ease burden on institutions, and would allow for ease of comparison for ED.</p> <p>Related to the above is the question of how ED will address the possibility that an institution’s answer to the next question, “How many students received emergency financial aid grants provided under Section 18004 of the CARES Act? (unduplicated across all HEERF sections)” might exceed the number of eligible students reported in the previous question, despite the fact that the institution was following the eligibility requirements that were in place when they awarded the funds. The evolving guidance issued over the course of the spring of 2020 may have led institutions to award HEER funds to students who ED later announced were ineligible, especially because ED encouraged institutions to spend funds promptly. We stress the need for ED to recognize and account for the fact that the number of eligible students may not be a consistent figure given that guidance has changed in the past and may change again, given ED’s statement in a recent court filing that they are “actively considering whether to retain or modify the rule in response to the comments it received.”</p>	<p>ED updated question 4 in the revised form to reflect our <a href="#">reporting notice published in the Federal Register</a> on August 31, which includes a footnote describing some of the acceptable methodologies an institution may use to report this number.</p> <p>ED clarified question 8 in the revised form to indicate that eligibility represents if the student was ever considered eligible during the reporting period.</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>Question 7, table row 1 automatically populates from Question 6 the dollar amount expended on HEERF direct grants to students. ED includes a footnote to clarify that this field includes direct grants to students that were intended, “To support any element of the cost of attendance (as defined under Section 472 of the Higher Education Act) per the Interim Final Rule published June 17, 2020”. However, the Interim Final Rule only addresses the definition of student, for the purpose of determining student eligibility for the grants, and not the use of funds. Further, the CARES Act specifies that the use of funds detailed in the footnote applies only to sections 18004(a)(2) and (3), while the allowed use of funds for section (a)(1) is for “expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student’s cost of attendance, such as food, housing, course materials, technology, health care, and child care).” Neither Congress nor ED limited use of HEERF direct grants to students under (a)(1) to eligible expenses under the COA; those expenses were included only as examples of eligible use of funds. As such, institutions may have used HEERF direct grants from (a)(1) to students to cover non-COA expenses, which will make the footnote to Question 7, table row 1 inaccurate. Since this is an automatically populated answer, the footnote does not appear necessary. We recommend removing the footnote to avoid confusion. If ED chooses to amend this question in some other manner, we wish to note that it could be impossible for institutions to differentiate whether HEERF direct grants to students from section 18004(a)(1) went toward eligible COA expenses or other expenses not eligible for inclusion in the COA.</p>	<p>The referenced footnote now only appears on question 9 of the revised form. That question is now aligned with quarterly reporting and the response is not automatically populated.</p>
		<p>Question 3 asks a filtering question, “ Did you distribute different amounts to eligible students based on different circumstances?”, to determine whether institutions then need to answer subsequent questions about use of an application or institutional administrative data to make awards. However, institutions may have used an application or institutional administrative data to make awards and still made the decision to award every recipient the same amount from HEERF. We recommend retaining the questions but removing the skip logic from the first question such that all respondents would answer all questions in item 3.</p>	<p>ED clarified question 5 of the revised form to better reflect the intent of the question. The question is meant to address ED’s interest in learning if there were differences in the amounts of awarded to students, and if so, what factor(s) potentially drove those differences in award amounts.</p>
		<p>The final question in the table in Question 7 asks for “Other uses of funds” and requires institutions to provide documentation. We question why institutions are required to provide documentation when that is not required for other expenses, and also question what type of documentation ED is seeking? Requiring institutions to provide documentation will increase burden, and it is unclear how documentation will aid in a post-analysis evaluation. At the very least, ED should be clear about the type(s) of documentation they will consider acceptable.</p>	<p>ED updated question 9 on the revised form to align with institutional quarterly reporting. The revised question splits “Other Uses” into two categories with clarifying footnotes for further guidance.</p>
		<p>Question 8 asks how many students who ever received HEER funds withdrew from the institution during the reporting period. This will require institutions to query older award years for a student’s receipt of HEER funds to compare against past and current student enrollment records to determine whether the student withdrew. Reporting across award years is often more complicated for institutions than querying a single award year and may be especially difficult for lower-resourced institutions with less sophisticated student information systems and/or fewer information technology or</p>	<p>ED acknowledges that systems may not be in place to report this data and that retrieving the data takes time and adds burden. However, it is important for grantees to report information regarding the early implementation of HEERF to inform the Department’s monitoring and technical assistance and to provide transparency to the public about uses of the</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

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		<p>institutional research staff. We recommend that ED work with lower-resourced institutions to evaluate the feasibility and associated burden of this reporting and to re-evaluate this item if it would create excessive burden.</p> <p>With respect to overall burden, we wish to note that all of the questions in this data collection are unlikely to be answered by a single business unit on campus. As such, coordination between offices will be a significant portion of the reporting burden. As such, ED’s estimate of 1.5 hours to complete the data collection appears low. We recommend re-evaluation of this burden estimate.</p> <p>Also, with respect to burden, we remind ED that the annual FISAP deadline is October 1, which will impact institutions’ ability to complete this data collection.</p>	<p>HEERF funds. Some public comments called for additional burden, others suggested the burden was too high. In recognition of the additional burden highlighted by public comment, ED has increased the burden estimate to 6 hours per institution.</p> <p>ED has modified the reporting period to be due on February 1<sup>st</sup> each year for previous calendar year expenditures and has also added a question asking if the institution has expended all of their HEERF funds (in which case they will not be expected to complete subsequent annual reports).</p>
		<p>Question 8 asks how many students who ever received HEER funds withdrew from the institution during the reporting period. ED should be clear about their definition of “withdrawal” for these purposes if ED intends to use this data to evaluate the efficacy of HEER funds to retain students. Financial aid administrations are likely to interpret this question to mean withdrawals during a payment period for which a Return to Title IV funds is required. If ED plans to evaluate retention with respect to HEER funds, it likely would be interested in students who left the institution between terms and not just Title IV withdrawals. ED should be clear in the instructions exactly what they would consider a withdrawn student for these reporting purposes.</p> <p>If ED is seeking to draw conclusions about the efficacy of HEER funds with respect to retaining students, it should specify the term in which the withdrawal took place relative to the receipt of HEER funds. The further the withdrawal occurs from the date of the receipt of HEER funds, the less likely the withdrawal could be assumed to result from the circumstances for which the HEER funds were received. For example, a student may have received HEER funds in July of 2020, and have successfully completed that summer term and the subsequent fall term. If they contracted Covid-19 in the spring of 2021 and were forced to withdraw, it should not be considered a failure of the HEER funding to retain the student. We recommend asking separate questions about students who withdrew in the same term or the subsequent term after receiving HEER funds.</p> <p>Finally, if ED intends to evaluate retention of HEERF recipients, it must consider the institution’s average retention rate as well, since those rates vary widely by institution, and the retention rate of HEERF recipients alone would not be sufficient data for that evaluation.</p>	<p>ED has updated question 10 in the revised form based on multiple public comments. ED believes that requesting more granularity on specific dates of withdrawal will be more burdensome for institutions than just requesting the enrollment status at the end of the reporting period.</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

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		<p>In Question 9a, we recommend that ED pre-populate the institution’s March 13 FTE count from the initial reporting to future data collections.</p>	<p>ED intends to pre-populate the FTE count in question 11 of the revised form from the initial reporting in subsequent reporting periods.</p>
		<p>We are interested in how ED plans to use data comparing March 13, 2020 FTEs to FTEs as of the end of each reporting period, since institutions were only required to pay all employees and contractors “to the greatest extent practicable”. It does not appear that ED could establish whether institutions had followed that requirement simply based on these two data points. Further, institutions are unlikely to include contractors in their count of FTE positions, so ED should specify that schools should add their contractors to their FTE count to ensure accurate data.</p>	<p>This question specifically addresses reporting requirements under Section 15011 of the CARES Act.</p> <p>ED has updated question 11 in the revised form to include additional historical reporting dates. ED believes providing additional reporting dates will provide institutions with greater flexibility to report data if the March 13, 2020 date presents significant challenges. ED encourages institutions to report FTE number as accurately as possible.</p> <p>ED has revised the instructions for this item to now read, <i>“(The number of FTE positions includes all staff regardless of whether the position is funded by Federal, State, local, or other funds—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.)”</i></p>
		<p>It is unclear whether Questions 2-5 are cumulative, or apply only to the reporting period. We recommend adding clear instructions to reduce confusion and ensure accurate reporting across institutions.</p> <p>If Questions 2-5 are intended to be answered for the reporting period only, ED needs to consider the fact that not every institution will have made awards in every reporting period. In the event that Questions 2-5 should be answered for the reporting period only, we recommend that ED add a filtering question that asks whether the institution made awards during that period, and uses skip logic to bypass these questions.</p>	<p>ED acknowledges the commentor’s lack of clarity about the applicable reporting period. ED has moved the reporting table to the front of the form. The instructions say, “This report should be completed based on activities in the applicable reporting period.” Therefore, the reporting form is requesting data only from the applicable reporting period and not cumulatively. Furthermore, ED has added a question asking if the institution has expended all of their HEERF funds (in which case they will not be expected to complete subsequent annual</p>



**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
<p><b>Document:</b> ED-2020-SCC-0122-0019</p>	<p><b>Name:</b> Georgette Edmondson-Wright  <b>Address:</b>                      Washington DC, 20052  <b>Email:</b> gewright@gwu.edu  <b>Organization:</b> The George Washington University</p>	<p>Question 3:“Circumstances” will be defined differently by institution. For GW, our methodology determined differing circumstances, using a student’s Estimated Financial Contribution (EFC) based on a completed and verified 2019/20 FASFA. Therefore, the checkboxes that follow would not apply in our case. If we check the response under “Other” we would need the option to upload a brief explanation/ statement to clarify our response to reviewers.</p> <p>Question 4:We suggest that this option include the ability to “check all that apply”, as we had multiple options for students to receive grant payments.</p> <p>Question 6: Again,having the option to include supporting documentation to explain “the Avg. HEERF Award Amount” would be useful. With two phases of awarding based on different eligibility requirements and different award amounts, the average award will require context for GW’s response.</p> <p>Question 8: Please clarify what is meant by “withdrawal” and what you are seeking to determine. GW awarded eligible students who were enrolled in Spring 2020. The first reporting period includes our Summer Session where many students do not enroll. We don’t understand how you are defining withdraw -is this mean for the semester from the university entirely? If the latter, please note that not all students who leave the university indicate their intent to do so and therefore we may have students who have left the university during the reporting period but we would not know a) if it is their intention to take a semester off(Leave of Absence)or b) not return at all. We would only be able to report those who have taken the effort to officially notify the university.</p> <p>Question 9: If 100% of both student and institutional funds have been awarded to students then providing FTE position information does not appear to be relevant. The funding GW received was not used to support institutional needs. We suggest that this question include the option for institutions to indicate “not applicable” with an explanation.</p>	<p>reports).</p> <p>Question 5 in the revised form has a checkbox for EFC. If there were no other factors in determining disbursements, no other factors need to be marked as applicable.</p> <p>Respondents can report any, all, or none of the distribution methods in response to question 6 in the revised form.</p> <p>Question 5 in the revised form intends to provide this context in a format that is easier for the Department to capture and summarize.</p> <p>ED has updated question 10 in the revised form to clarify what is meant by “withdrawal,” based on this and other comments.</p> <p>The question about FTE is meant to address reporting requirements under Section 15011 of the CARES Act</p>
<p><b>Document:</b> ED-2020-SCC-0122-0020</p>	<p><b>Name:</b> Christopher Walck  <b>Address:</b> Falls Church, VA, 22043  <b>Email:</b> CHRISTOPHERW@JPMS.COM  <b>Submitter's Representative:</b> Christopher Walck  <b>Organization:</b> Paul</p>	<p>As the Department is aware, IHEs are required to submit annual audits to the Department as a condition of participating in Federal Student Aid programs. The same information that the Department proposes to collect via the new information collection can be collected as a part of this annual audit. Using the annual audit to report this information will eliminate the need for additional reporting by institutions, therefore lowering or eliminating the administrative burden. This can be done with very little or no added cost-we have consulted with several auditors who indicate that the additional expense in the audit process would be de minimis. In addition to lowering the burden on IHEs, it will also add a measure of accountability through the independent audit process by ensuring that IHEs accurately report information.</p> <p>Alternatively, the Department could collect this information using the IPEDS Finance Survey (Part F). The IPEDS Survey (Part F) currently collects data regarding institutional revenues, including government grants, as well as expenses. The</p>	<p>Given the additional granularity necessary to fulfill requirements specific to ESF spelled out in certifications and Section 15011 of the CARES Act, the limited overall reporting timeframe of the data collection, and the interest to have data sooner for purposes of transparency, the Department does not believe that this information can be collected as part of annual audits for Federal Student Aid nor is combining this information collection with the with IPEDS Finance Survey is an adequate solution.</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
	Mitchell Schools	Department should consider modifying the IPEDS survey to include the specific information in the proposed data collection. IPEDS is already recognized as the best, single source of data about higher education financial data. Integration with IPEDS would avoid the need to impose a new data collection obligation on institutions. It would also have the advantage of integrating the data collected into the overall financial picture of IHEs and trends across the higher education sector. This would be useful when comparing the impact of the HEERF relief in the sector during the COVID-19 pandemic. It would also allow for an "apples to apples" comparison of data before, during, and after the pandemic.	
<b>Document:</b> ED-2020-SCC-0122-0021	<b>Email:</b> lisa.wheeler@normandale.edu <b>Government Agency Type:</b> State <b>Government Agency:</b> Minnesota State College and Universities, Normandale Community College	I don't think the cell "Amount in (a)(1) institutional dollars"/"Replacing lost revenue from non-tuition sources..." should be blacked out. The Higher Education Emergency Relief Fund (HEERF) Data Collection Form (Version 7/22/2020) included these as eligible expenses. The document, "Supplemental Frequently Asked Questions under Section 18004 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, originally issued June 30, 2020. Question 1 updated August 6, 2020. Question 5 updated September 8, 2020." contained this question and response: 10. How do recipients of section 18004(a)(2) and (a)(3) funds document lost revenues? Do lost revenues relate only to disruption of instruction? Does lost revenue include revenue lost from cancelled summer camps or unused parking lots? Upon request from the Department, institutions must provide documents demonstrating year-over-year decreases in revenue that are the result of a decline in enrollment, a decline in student fees including housing fees and meal plans, a decline in parking and facilities revenue, or a decline in revenue from summer programs or other activities disrupted by COVID-19. Therefore, I think it is inaccurate to black out the cell referenced above.	The table in question 9 of the revised form was updated based on recent updates to ED quarterly report requirements.
<b>Document:</b> ED-2020-SCC-0122-0022	<b>Name:</b> Kalli Blackwell <b>Address:</b> United States, <b>Email:</b> <a href="mailto:NKent@duanemorris.com">NKent@duanemorris.com</a>	<p>The Integrated Postsecondary Education Data System ("IPEDS") Finance Survey (Part F) presents an opportunity for the Department to collect the same information with a lower burden on institutions. And it will allow the data collected to be integrated quickly with existing financial data for the higher education sector, facilitating access and use of the data.</p> <p>According to the IPEDS website, data collected through the Finance Survey "provides context for understanding the resources and costs of providing postsecondary education and its contribution to the gross national product." Data collected include:</p> <ul style="list-style-type: none"> <li>• Revenues by source (e.g., tuition and fees, government grants and contracts, private gifts);</li> <li>• Expenses by function (e.g., instruction, research, academic support, institutional support);</li> <li>• Assets and liabilities; and</li> <li>• Scholarships and fellowships.</li> </ul> <p>With regard to revenue, the Finance Survey already contains several questions that pertain. For example, "Other federal grants" covers students and "federal grants and contracts" covers grants to institutions. See, e.g. IPEDS Survey (Parts C-1-02, C-2-13, and Part-D-02b). Similarly, use of institutional grant funds could be reported in Part-E either by functional or natural expense classification. Alternatively, a new reporting line could be created to break out the expenditure of HEERF</p>	Given the additional granularity necessary to fulfill requirements specific to ESF spelled out in certifications and Section 15011 of the CARES Act, the limited overall reporting timeframe of the data collection, and the interest to have data sooner for purposes of transparency, the Department does not believe that combining this information collection with the IPEDS Finance Survey is an adequate solution.

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>funds.</p> <p>Overall, we believe that reporting this information to the Department via the IPEDS Finance Survey is a better method for collection of HEERF related data. IPEDS is an existing means of data collection. Using it will reduce the burden on institutions. And, the information collected via IPEDS will allow for easier access and study in the future by researchers, policymakers, and the public.</p> <p>Additionally, notwithstanding the instrument used to collect the data, we recommend the Department modify the first survey version to allow institutions to provide additional data and narrative context in areas where the proposed data points could be misleading or misconstrued. For example, question #8 requires institutions to report the number of students who received HEERF grant funds and withdrew from the institution within the reporting period. A withdrawal rate will auto-calculate based on a formula: students who dropped out divided by total number of students who received funds. This formula omits a critical variable: students who withdrew as a result of the COVID-19 national emergency. Not factoring in this variable may result in a lower withdraw rate due to circumstances outside the institutions' control. Because reporting a low withdrawal could be misinterpreted as low program quality, it is important to add COVID-19 withdrawals to the formula.</p> <p>Likewise, #9 requires the full-time equivalent ("FTE") positions as of March 13, 2020 and the FTE positions as of the last day of the reporting period. It is critical institutions have the ability to provide context when these two data points differ. For example, employees may have resigned their duties due to the national emergency despite an institution's willingness to continue their employment. The inability to provide this context could lead to a conclusion of noncompliance with Section 18006 of the CARES Act. Adding a simple text box that allows institutions the ability to provide narrative context would address this concern.</p>	<p>Institutions can add explanatory notes and comments on question 9 of the revised form. However, ED believes adding comments/clarifications throughout the information collection will significantly increase burden for institutional respondents.</p>
<p><b>Document:</b> ED-2020-SCC-0122-0023</p>	<p><b>Name:</b> Ariel Jona  <b>Address:</b> Washington, DC, 20515  <b>Email:</b> ariel.jona@mail.house.gov  <b>Submitter's Representative:</b> Chairman Robert C. "Bobby" Scott  <b>Organization:</b> Committee on Education and</p>	<p>While we recognize the need to avoid placing undue administrative burden on institutions while educators continue to grapple with the impacts of COVID-19, we believe that more frequent data collection is appropriate given the ever-changing nature of the pandemic and evolving institutional responses. Collecting information at intervals that align with common academic calendars (e.g. fall, spring, and summer semesters) would provide vital information on how and when institutions are spending HEER funds. For example, we are particularly interested in knowing how quickly institutions disbursed emergency financial aid grants to students in compliance with section 18004(c) of the CARES Act, the share of institutions receiving emergency aid funding that disbursed all emergency aid during the spring 2020 semester, and the share that reserved funds for use in subsequent semesters. The Department should consider adding a brief, open-ended question regarding institutional plans for any funds that are being carried over into future semesters. To minimize additional burden, these data could be collected through the use of a shorter, supplementary form that would allow institutions to update expenditure levels and add or remove uses of funds as time goes on, using screener questions, skip logic, and pre-filled responses based on previous reports. Alternatively, the Department could continue to administer the</p>	<p>The Department recently added a quarterly data collection requirement that aligns with question 9 of the revised form.</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
	Labor <b>Government Agency</b> Type: U.S. House of Representatives	<p>data collection on an annual basis, but require that institutions disaggregate data by quarter, semester, or other interval.</p> <p>We also believe the data should be publicly available. We further urge the Department to ensure that policymakers and the public are able to view the information collected through the proposed data collection form. In addition to publishing descriptive statistics as planned by the Department,<sup>1</sup> we urge you to make institution-level data available on a centralized Departmental website so that students, families, policymakers, and other stakeholders know how taxpayer dollars are being spent.</p> <p>Should the Department make institution-level data publicly available, it must ensure that no personally identifiable student information is released, including by requiring each school to designate the appropriate n size so that no personally identifiable information will be shared.</p> <p>Information on institutional disbursement of emergency student financial aid grants is of keen interest to the Committee because it can inform ongoing policy development. Such information can also facilitate the identification of best practices and help institutional leaders learn from one another. To that end, we recommend the Department add to the Emergency Financial Aid Grants to Students section of the data collection form questions regarding:</p> <ul style="list-style-type: none"> <li>• Whether the institution established eligibility criteria for emergency aid aside from those imposed by the Department (e.g. enrollment intensity, expected family contribution of a certain level, or demonstrated unmet financial need). This could take the form of a multiple-choice question with an option to describe other eligibility restrictions not listed on the form.</li> <li>• Whether the institution attached any conditions or requirements to emergency aid (e.g. re-enrolling in a subsequent semester or signing an attestation regarding the student’s use of emergency funds). This could take the form of a multiple-choice question similar to the recommendation above.</li> <li>• Whether the institution established minimum or maximum emergency aid award levels and, if so, what levels were established.</li> </ul> <p>We additionally urge the Department to make improvements to question 6 to collect comprehensive information on the ways in which institutions award and finance emergency grants using HEER funds. Specifically, we recommend the Department:</p> <ul style="list-style-type: none"> <li>• Disaggregate data on emergency aid recipients by race and dependency status, in addition to Pell recipient status, enrollment intensity, and academic level. Given the disproportionate rates of COVID- 19 infections among people of color,<sup>2</sup> and the challenges faced by independent students who must work to support themselves and, often, balance</li> </ul>	<p>ED plans to make data and statistics from this collection publicly available by institution. Additionally, ED will ensure that no personally identifiable information on students or institutional representatives completing the survey is released.</p> <p>Like the Committee, ED is interested in understanding how institutions disbursed emergency financial aid grants to students.</p> <ul style="list-style-type: none"> <li>• Question 5 in the revised form evaluates which criteria were considered generally in determining emergency grant amounts for students. In addition, question 8 in the revised form is intended to collect information regarding the extent certain categories of students may not be receiving grants.</li> <li>• ED has revised Question 7 in the revised form to capture if there were conditions to students’ receipt of funds.</li> <li>• ED added questions about minimum and maximum awards to Question 8 in the revised form.</li> </ul> <p>Further disaggregation of the data may overly burden institutions. For example, there are currently six columns in the table and adding the permutations of 9 race/ethnicity categories and 2 dependent statuses, for example, would result in over 100 columns/ permutations and up to a dozen rows for up to 1000+ data points to enter.</p>

<sup>1</sup> Supporting Statement for Paperwork Reduction Act Submission Higher Education Emergency Relief Fund (HEERF) Data Collection Form (July 29, 2020); available at <https://www.regulations.gov/document?D=ED-2020-SCC-0122-0002>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>parenting with coursework, it is highly likely that these student groups are experiencing particularly acute challenges as a result of the pandemic. Disaggregated data will help institutional leaders and federal and state policymakers identify the students who are most in need of additional support and appropriately target resources.</p> <ul style="list-style-type: none"> <li>• Add sub-questions regarding the amount of funds institutions used to reimburse themselves for previously issued emergency grants from the section 18004(a)(1) institutional portion, the 18004(a)(2) portion, and the 18004(a)(3) portion. In the section of the table related to the section 18004(a)(1) student portion, the Department asks institutions to distinguish between the amounts disbursed directly to students from the amounts reimbursed to the institution for previously made emergency grants. Such a distinction should also be made for the other HEER funding streams.</li> </ul>	<p>The questions as written include disaggregation by direct and reimbursed in each case.</p>
		<p>In order to further gauge the impact of the CARES emergency relief, the Department’s proposed questions on the amount of funds spent on various categories of expenditures should be expanded and refined. Specifically, we recommend that a column be added to the table included in question 7 to provide an estimate of the number of students benefitting from each category of relevant expenditures (e.g. the number of students who benefit from tuition discounting or the provision of additional technology such as laptops or tablets). We additionally recommend that the Department collect information separately on the following categories of expenditures within the table included in question 7:</p> <ul style="list-style-type: none"> <li>• Providing additional technology to faculty, such as laptops or tablets;</li> <li>• Providing or subsidizing the cost of highspeed internet to students;</li> <li>• Providing or subsidizing the cost of highspeed internet to faculty;</li> <li>• Subsidizing off-campus housing costs due to dorm closures or decisions to limit housing to one student per room; subsidizing housing costs to reduce housing density;</li> <li>• Paying for hotels or other off-campus housing for students who need to be isolated; and</li> <li>• Paying travel expenses for students who need to leave campus early due to COVID-19 infection or campus interruptions.</li> </ul>	<p>ED has aligned revised question 9 on the annual reporting form to align with the quarterly reporting form, which includes categories of expenditures such as those cited in the comment. However, ED recognizes that it will never accurately foresee each and every type of expenditure IHEs may make with these funds</p>
		<p>Question 8 asks institutions to provide information on the withdrawal rates of students who received CARES emergency financial aid grants. Reporting this information without context could lead to inappropriate conclusions about the effectiveness of emergency aid in helping students persist in and complete a postsecondary program. To ameliorate this issue, we encourage the Department to add columns collecting information on the number of emergency aid recipients who are still enrolled or have completed a degree or other credential to the table associated with question 8.</p>	<p>ED has updated question 10 in the revised form to include these additional categories.</p>
		<p>Question 9 seeks to collect information on the number of full-time equivalent (FTE) positions created or retained as a result of the HEER funds awarded to institutions. Such information will help policymakers determine whether institutions</p>	<p>ED has revised the instructions for question 11 in the revised form to now read, “(The number of FTE positions includes all</p>

<sup>2</sup> Centers for Disease Control and Prevention, COVID-19 Hospitalization and Death by Race/Ethnicity (August 18, 2020); available at <https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html>

Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form Response to 60-Day Public Comments			
Document	Contact information	Comment	Response and Notes
		are meeting the requirements of section 18006 of the CARES Act. <sup>3</sup> We urge the Department to further ensure the utility and accuracy of these data by providing greater clarity on which types of employees should be counted when calculating the total FTE count, addressing the employment and counting of contractors, and disaggregating the number of faculty, staff, and students employed by each institution.	<i>staff regardless of whether the position is funded by Federal, State, local, or other funds—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.)”</i> In addition, ED has updated question 11 in the revised form to include additional historical reporting dates. ED believes providing additional reporting dates will provide institutions with greater flexibility to report data if the March 13, 2020 date presents significant challenges. ED encourages institutions to report FTE number as accurately as possible.
<b>Document:</b> ED-2020-SCC-0122-0024	<b>Name:</b> Kay Lewis	<p>The questions proposed will not fully capture how we awarded emergency funds to students if #3 is not fully presented for completion. As we provided both standard grants based on pre-existing data and individual grants based on an application, we would need to be able to complete all of #3 to capture that information. If any of the questions are not present due to skip logic, then we would not be able to accurately complete the questions.</p> <p>In addition, Appendix 1 indicates we need to list minimum and maximum grant amounts we don't see where we report that information on the tables presented in this draft.</p>	<p>Question 5 in the revised form allows institutions to respond for both pre-existing and application data.</p> <p>ED has added minimum and maximum HEERF emergency grant amounts to question 8 in the revised form.</p>
<b>Document:</b> ED-2020-SCC-0122-0025	<p><b>Name:</b> Eileen McLoughlin  <b>Address:</b> Albany, NY, 12246  <b>Email:</b> angela.wright@suny.edu  <b>Submitter's Representative:</b> Angela Wright  <b>Organization:</b> State University of New York  <b>Government Agency Type:</b> State Government  <b>Agency:</b> State University of New York</p>	<p>(1) What data in this form will be difficult to collect or report and why? Are there changes that could be made to improve the quality of the data or reduce the burden?</p> <p>Question 1c requests that colleges/universities provide website(s) URLs for the 30-day Fund Report as required by the May 6, 2020 Electronic Announcement. Providing such documentation in additional forms, such as pdf, should be permissible.</p> <p>Colleges/universities may have updated the 30-day reporting URLs for the subsequent 45-day and quarterly reporting information and the URLs no longer reflect the 30-day reporting information.</p> <p>Question 3 asks institutions to select an option which best describes how emergency financial aid grants to students were distributed. Colleges/universities were not limited to one distribution method. Thus, base amount awards were distributed to eligible students with no application and enhanced awards were based on a completed application. Therefore, the Data Collection Form should include an option enabling colleges/universities to indicate both types of distributions rather than either/or.</p> <p>The Award Distribution Chart on Question 6 includes a “Pell Recipients” categories which we suggest changing to “Pell Eligible”. Colleges/universities may have provided funds to students who were “Pell Eligible” as well as “Pell Recipients”</p>	<p>ED has updated question 3 in the revised form to include all active websites.</p> <p>ED has clarified question 5 in the revised form based on this and other comments.</p> <p>ED acknowledges Pell eligibility reflects students with the lowest EFCs who may have received emergency awards.</p>

<sup>3</sup> The Coronavirus Aid, Relief, and Economic Security Act, § 18006, which specifies that “a local educational agency, State, institution of higher education, or other entity that receives funds under “Education Stabilization Fund”, shall to the greatest extent practicable, continue to pay its employees and contractors during the period of any disruptions or closures related to coronavirus.”.

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>which reflected the students with the lowest estimated family contributions (EFCs). Pell eligible students may or may not have received a Pell award, but all had EFCs within the Pell range. The “Pell” category should be changed to Pell Eligible to better reflect all the students with the lowest EFCs who received emergency awards.</p> <p>Colleges/universities may use Institutional Award funds to offset reimbursements issued to students for room and board costs. In many cases, the total refunds issued to students were greater than the Institutional Award provided from the HEERF, hence there may not be a dollar for dollar match to each student refund. The Data Collection Form should include a category to report the total amount of Institutional Funds used to reimburse the college/university for room, board, and fees refunds to students without having to report the reimbursement amount on the Award Distribution Chart.</p> <p>On question 7, the category “Operating additional class sections to enable social distancing, which includes hiring more instructors and increasing campus hours of operations” should also include disbursements related to maintaining instructors or redirecting existing workforce.</p> <p>(4) Will the proposed method for collecting the number of FTE positions created or retained as a result of HEER funds awarded to IHEs yield accurate data? Is there an alternative methodology that would improve the accuracy of the data? The Data Collection Form should allow colleges/universities to report FTEs using an alternative period such as reporting the FTEs using the pay periods which includes March 13th and June 30th. Additionally, FTEs change throughout normal academic and operational cycles at colleges/universities. Often adjunct professors, students, and staff are on the payroll for only the academic year would not be on the payroll on June 30th. Such changes are not indicative of a college/university failing to “continue to pay employees and contractors to the greatest extent practicable”. Therefore, the reporting document should afford the college/university the opportunity to explain generally, the normal operating changes to FTEs between March 13th and June 30th.</p>	<p>However, ED believes that changing to Pell eligible for this data collection would increase burden and potentially negatively affect data quality.</p> <p>This data collection form requests information on HEERF funding. Regardless of whether these funds were mixed with other funds, ED still requires an accounting of how much HEERF funds were spent on particular activities.</p> <p>Institutions are encouraged to make explanatory notes in their quarterly reporting to reflect individual circumstances like this.</p> <p>ED has revised the instructions for question 11 in the revised form to now read, “(The number of FTE positions includes all staff regardless of whether the position is funded by Federal, State, local, or other funds—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.)” In addition, ED has updated question 11 in the revised form to include additional historical reporting dates. ED believes providing additional reporting dates will provide institutions with greater flexibility to report data if the March 13, 2020 date presents significant challenges. ED encourages institutions to report FTE number as accurately as possible.</p>
<p><b>Document:</b> ED-2020-SCC-0122-0026</p>	<p><b>Name:</b> Tanda McCombe</p>	<p>(1) The title "Institutional Support" in question 7 initially led me to think it was referring to the Institutional portion (84.425F). It took several readings to understand that I would be reporting, in total, on our student, institutional and MSI portions together. I think most recipients view them separately.</p> <p>(2) The level of detail is too great. However, the information gained, particularly about the use of technology, has great value in determining regional connectivity landscapes and its implication on education.</p> <p>(3 )As a best practice for not comingling funding awarded under different grants, I would assume most IHE have segregated the information pertaining to each of these type grants into separate accounts. Basic system generated</p>	<p>1. ED has removed title “institutional support”</p> <p>2. ED is accountable for reporting on how funds are used by institutions through this significant investment.</p> <p>3. ED has aligned revised question 9 on the annual reporting</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>reports, per account, could easily be used to provide the information. Additionally, viewing them as a whole could lead to confusion about variances in allowable uses between the various types of awards.</p> <p>(4) I do not think this method will yield accurate results because it does not reflect the change in environment. We have added positions using HEERF based upon the new needs but have also adopted a policy, based upon economic downturn, to not replace vacant positions at this time. Need to be more directed towards metric you are trying to measure.</p>	<p>form to align with the quarterly reporting form.</p> <p>4. ED has revised the instructions for question 11 in the revised form to now read, “(The number of FTE positions includes all staff regardless of whether the position is funded by Federal, State, local, or other funds—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.)” In addition, ED has updated question 11 in the revised form to include additional historical reporting dates. ED believes providing additional reporting dates will provide institutions with greater flexibility to report data if the March 13, 2020 date presents significant challenges. ED encourages institutions to report FTE number as accurately as possible.</p>
<p><b>Document:</b> ED-2020-SCC-0122-0027</p>	<p><b>Name:</b> Amanda Roberson  <b>Address:</b>                      Washington, DC, 20006  <b>Email:</b> ajroberson@ihep.org  <b>Submitter's Representative:</b> Amanda Roberson  <b>Organization:</b> Institute for Higher Education Policy (IHEP)</p>	<p>PostsecData strongly recommends that ED make data generated through this collection publicly available in an accessible, user-friendly and machine-readable format. For instance, publishing quarterly reports on HEERF spending allocations on the Office of Federal Student Aid (FSA) Data Center website in a downloadable Excel or CSV file would maximize the utility of the information collected and be consistent with existing ED transparency efforts. Publishing the resulting data on ED’s website is critical to ensuring that students, families, policymakers, and taxpayers have access to relevant and comprehensive data to examine how institutions spent these funds and to inform future appropriations into these or other funds. To facilitate publishing the data in this way, ED should consider the most efficient collection format, and may need to require institutions to submit data in a machine-readable format (such as a CSV or Excel file) or prohibit certain submission formats that are not conducive to transparency (such as a PDF or Word document). ED should draw on their experience collecting data through the Integrated Postsecondary Education Data System (IPEDS) as well as other data tools in order to identify the most efficient process. The technology used and requirements for data collection have important implications for the burden on institutions and effort for ED.</p> <p>Identifying the number of students and dollar amounts of emergency aid awarded through HEERF is a core component of the proposed data collection, and we encourage ED to maintain these questions in the final data collection instrument. Differentiating between funding to graduate and undergraduate students, Pell recipients, and full- and part-time students (question 6) will be essential in understanding who benefits from the emergency federal aid. The Pell disaggregate is especially important because it will provide information on how much emergency aid went to students who were in an economically precarious position even before the onset of the pandemic. Pell recipients are likely to have been further burdened by COVID-19’s economic and educational impact, so transparency about the extent of the support these students received will be of paramount importance to the higher education community in the years to</p>	<p>ED plans to publish data in a machine-readable format in the future. The Department will consider efficient ways of collecting data in the development of the actual data collection mechanism.</p> <p>Further disaggregation of the data may overly burden institutions. For example, there are currently six columns in the table and adding the permutations of 9 race/ethnicity categories and 2 dependent statuses, for example, would result in over 100 columns/ permutations and up to a dozen rows for up to 1000+ data points to enter.</p>



**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>come. In addition to the disaggregates already included in the form, PostsecData strongly urges ED to require data to be disaggregated by race/ethnicity. The pandemic has disproportionately impacted the health and economic well-being of Black, Indigenous, and Latinx students, along with their families and broader communities, so disaggregating data on student emergency grants by race and ethnicity is critical to understanding the extent to which the federal funding is tackling these inequities. Institutions should have student race/ethnicity information readily available due to other required reporting (such as the IPEDS collection).</p> <p>At the time of submitting this letter, just seven months have passed since colleges first closed their doors in response to the pandemic in the United States. The rapid and continuous shifts in higher education in that short time make clear that annual reporting under HEERF may be insufficient and point to the need for more responsive data to help policymakers with their decision-making before it's too late. PostsecData recommends that institutions report HEERF data on a fiscal quarter schedule, consistent with other FSA data releases.</p> <p>In the case that the Department maintains its annual reporting requirement, we recommend the addition of questions about the share of HEERF spending that occurs each quarter. Anecdotal reports indicate that some institutions have spent little to no HEERF funding yet, and consistent data about quarterly spending patterns are needed to illuminate these trends more accurately. This approach, in contrast to our suggestion of quarterly reporting, does not provide policymakers and other key stakeholders with actionable information in a timely manner but does allow for a retrospective analysis of fluctuations in the spending patterns of institutions over time.</p>	<p>ED has developed more frequent quarterly reporting requirements.</p>
		<p>ED's proposed collection form includes questions intended to gauge the combined impact of the pandemic and HEERF grant support. Specifically, question 8 asks for the number of students who withdrew from the institution after receiving emergency financial aid grants. While we believe this information is useful and support its inclusion, ED could also consider how to incorporate reporting on withdrawal rates of students who did not receive emergency financial support to contextualize outcomes of HEERF recipients. Likewise, it may be helpful to include counts of student completers and those still enrolled to gain a more thorough understanding of how HEERF-recipients and non-recipients are progressing in their education.</p>	<p>ED has added additional categories for "still enrolled" and "completed" in question 10 of the revised form.</p> <p>Reporting on retention/withdraw/completion of eligible students who did not receive funds could result in undue additional burden when other administrative data (e.g., IPEDS) could be used as a comparison.</p>
		<p>Similarly, question 9 asks for the number of full-time equivalent (FTE) positions as of the start of the pandemic and the end of the most recent reporting period. We believe this information will provide valuable insight into how institutional capacity has been impacted by the pandemic and associated stimulus funding provided through HEERF. However, we believe this information would be more useful if institutions were required to report separately the number of FTE instructional staff, non-instructional staff, and student undergraduate and graduate employees. Each of these categories serves a unique function for universities, and these categories are aligned with IPEDS reporting requirements making the additional burden in reporting more detailed employment figures minimal. More granular information would provide a</p>	<p>ED has revised the instructions for question 11 in the revised form to now read, "<i>(The number of FTE positions includes all staff regardless of whether the position is funded by Federal, State, local, or other funds—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.)</i>" ED will not add more granular information in response to this comment because it</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>way to assess how the distribution of staffing has changed in the aftermath of COVID-19.</p>	<p>would greatly increase burden.</p>
		<p><b>Include minor edits to questions on emergency financial aid grants to students and institutional funding under HEERF and consider collecting information about institutional data-sharing and use policies (low priority).</b></p> <p>First, PostsecData strongly supports data collection examining the processes institutions use to allocate emergency financial aid grants to students under HEERF and believes this data will be extremely important in evaluating these funding strategies in response to the pandemic. PostsecData would like to thank ED for including these questions and suggests several minor changes to question 3 of the data collection to further improve the efficacy and value of the HEERF data collection (included as tracked changes and comments in the Appendix).</p> <p>Second, PostsecData strongly supports the collection of information on institutional expenditures using HEERF dollars. The information provided will be critical in understanding the institutional responses to the pandemic, and variation in these strategies. We urge ED to consider requiring two additional line item categories for institutional expenditures supported by HEERF dollars: 1) Revenue sharing contracts entered into by the institution to manage and implement the transition to distance learning, and 2) Marketing and communications spending.</p> <p>Third, in the interest of student privacy, PostsecData would encourage collection of information regarding whether institutions communicated with students how their data would be collected, secured, and shared and for what purposes. We have included a suggestion for how this question might be framed in the Appendix.</p>	<p>ED acknowledges the comment and has edited the revised form as applicable.</p> <p>Some items like marketing are not allowable expenses. In addition, the revenue-sharing may overlap with other existing categories. Note that the institutional certification and agreement states, “Section 18004(c) of the CARES Act allows Recipient to use up to 50 percent of the funds received to cover any costs associated with significant changes to the delivery of instruction due to the coronavirus so long as such costs do not include payment to contractors for the provision of preenrollment recruitment activities, including marketing and advertising; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship (collectively referred to as “Recipient’s Institutional Costs”).”</p>
<p><b>Document:</b> ED-2020-SCC-0122-0028</p>	<p><b>Name:</b> Susan Menditto <b>Address:</b> Washington, DC, 20005 <b>Email:</b> Smenditto@nacubo.org <b>Submitter's Representative:</b> Susan Menditto <b>Organization:</b> National Association of College</p>	<p>Feedback provided by business officers indicates that the time to complete the information request and report far exceeds the Department’s 90-minute estimate per institution. In fact, college and university financial reporting experts believe that the student aid portion will take two to three business days to complete because the various cross sections of requested details are not collected and organized in a way that easily accommodates the desired information. Consequently, there would need to be several runs of coding and testing from systems of record in order to comply.</p>	<p>In recognition of the additional burden highlighted by public comment, ED has increased the burden estimate to 6 hours per institution.</p>
		<p>Most information requested for these funds compares to details provided by the Department on its Higher Education Emergency Relief Fund webpage. However, the items discussed below have incomplete or conflicting guidance from the Department. Further, a significant allowable use of institutional portion funds—those used to provide refunds to students for room and board, tuition, and other fees incurred as a result of campus closures in March 2020—does not have a unique reporting line. Although institutions can use the “other” category to report these amounts, we recommend that such a line be added to enhance reporting consistency, clarity, and transparency. List of provided use of</p>	<p>ED has updated question 9 in the revised form to reflect and align with institutional quarterly reporting requirements issued by ED.</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
	<p>and University Business Officers</p>	<p>funds: The following items need additional interpretation and explanation; some do not appear to be an allowable use of funds. NACUBO’s concerns: Tuition discounting: Tuition discounting is a common sector term used to describe institutional aid provided to students that lowers the published price of tuition. Tuition discounting is not an expense. The Department has not provided guidance for this item. Perhaps an allowable use of funds would be an institution’s costs to subsidize online instruction for students so that a lower price can be charged. If the Department finds this to be the case, then this use of funds should be clearly defined.</p> <p>Purchasing additional instructional equipment and supplies (such as laboratory equipment or computers) to reduce the number of students sharing equipment or supplies during a single class period and to provide time for disinfection between uses We seek clarification that in addition to purchasing equipment, the rental of equipment is allowable.</p> <p>Replacing lost tuition revenue due to reduced enrollments The CARES Act clearly allows this use for Section 18004(a)(2) and (a)(3) funds. There is no documentation or Department guidance that supports this use of funds for Section 18004(a)(1) funds. This continues to be an ongoing area of confusion on college and university campuses; the Department should take steps to ensure clarity both on the reporting form and in its guidance concerning whether or not this is an acceptable use of Section 18004(a)(1) funds.</p> <p>Replacing lost revenue from non-tuition sources (i.e., cancelled ancillary events; disruption of food service, dorms, childcare or other facilities; cancellation of use of campus venues by other organizations, lost parking revenue, etc.) This type of revenue loss appears to be an allowable use of CARES Act Section 18004(a)(2) and (a)(3) funds—and not allowable under 18004(a)(1).</p> <p>Purchasing faculty and staff training for online instruction It is possible for institutions to redeploy staff who otherwise would have been furloughed or released for these functions. Clarification is needed because such expenses would be related to the coronavirus disruption.</p> <p>Purchasing additional equipment or software to enable distance learning, or upgrading campus wi-fi access or making wi-fi access available to the public by extending open networks to parking lots or public spaces, etc.</p> <p>We seek clarification that rental expense for additional equipment, software, technology services, or licensing would also qualify.</p>	

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>Other uses of funds. Please describe To reinforce our earlier discussion concerning student refunds provided for services that could not be performed when campuses closed—this is the only available line to report such information. Since these amounts were significant for many institutions, comprehensibility would be enhanced by providing a unique reporting category for this use of funds.</p>	
<p><b>Document:</b> ED-2020-SCC-0122-0029</p>	<p><b>Name:</b> Deborah Agee <b>Submitter's Representative:</b> Deborah Agee <b>Organization:</b> California Association of Financial Aid Administrators</p>	<p>What data in this form will be difficult to collect or report and why? Are there changes that could be made to improve the quality of the data or reduce the burden?</p> <ul style="list-style-type: none"> <li>• Since HEERF grant funds will not be distributed beyond AY 2019-21, there should be no requirement to report HEERF grand funds distributed in AY 2021-22. We therefore recommend eliminating the 3rd Annual Report due on September 20, 2022.</li> <li>• Data Collection Form Q1: Institutional identifiers, Contact information, and URL for 30-day fund Report. Who is the lead contact for the data collection? Recommend having separate contacts for Financial Aid, Institutional and MSI grants.</li> <li>• Data Collection Form Q6: Use the instruction noted in Appendix 1 to complete the following table. This question will require significant work to develop queries, reconcile, and validate data. Schools will be required to develop a method of retrieving the data needed for this reporting and could be considered burdensome for some.</li> <li>• Data Collection Form Q9: Provide the full-time equivalent (FTE) positions as of March 13, 2020 and the FTE positions as of the last day of the reporting period.</li> </ul> <p>A March 13 date will be nearly impossible to calculate given that many schools do not track FTE by day. Further complicated by monthly versus biweekly pay periods. We recommend some flexibility to report a reasonable range of “as of dates”, particularly since many institutions only report official staffing census data once per year.</p> <p>The Department is interested in reducing the burden of data collection and making use of existing data when at all possible. For example, are there alternative methods to collect data or data that is already collected on institutional expenditures related to HEERF under section 18004a of the CARES Act?</p> <p>Not all operational costs associated with COVID-19 which are being absorbed by institutions qualify as appropriate uses for HEER funding. For instance, increased sanitizing and cleaning efforts or loss/reduced student presence on campus due to require social distancing are ineligible uses of these funds. Recommend any future funding distributed to campuses by the Department revisit eligible fund usage to include a broader range expenditures.</p>	<p><a href="#">Question 1 in the supplemental FAQs</a> explains that institutions have 1 calendar year to expend funds unless granted an NCE.</p> <p>ED acknowledges that systems may not be in place to report this data and that retrieving the data takes time and adds burden. However, it is important for grantees to report information regarding the early implementation of HEERF to inform the Department’s monitoring and technical assistance and to provide transparency to the public about uses of the HEERF funds. Some public comments called for additional burden, others suggested the burden was too high. In recognition of the additional burden highlighted by public comment, ED has increased the burden estimate to 6 hours per institution.</p> <p>ED has updated question 11 in the revised form to include additional historical reporting dates. ED believes providing additional reporting dates will provide institutions with greater flexibility to report data if the March 13, 2020 date presents significant challenges. ED encourages institutions to report FTE number as accurately as possible.</p>

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
ED-2020-SCC-0124-0005	<b>Name:</b> Robin Lewis Georgia College & State University State	<p><b>Director of FA:</b> How many students were eligible to receive the HEERF emergency grants made available under section 18004 of the CARES Act is difficult to determine. Institutions were asked to come up with a distribution plan. We can certainly provide reporting data based on the plan but in no way can we determine how many students were eligible for these funds. We can report how many received funding. The data now being asked doesn't seem to line up with initial guidance provided when our distribution plans were created.</p> <p><b>Director of OGSP:</b> Q6-line 1: define clearly what an "eligible student" is. Looking at how the amount of funding was allocated "(1) 75% based on each IHE's share of full-time equivalent (FTE) enrollment of Pell Grant recipients, relative to the total FTE enrollment of such individuals in all IHEs; and (2) 25% of the funds will be awarded to IHEs based on each IHE's share of FTE enrollment of students who were not Pell Grant recipients, relative to the total FTE enrollment of such individuals in all IHEs", It would appear that all students eligible to file a FAFSA should be count regardless of grad/undergrad and if they filed or not. But others believe that only Pell qualified students were eligible or only students with a FAFSA on file are eligible. Please give us one definition to provide consistent data for. <i>(2) The Department believes the data requested under this collection will be valuable for multiple purposes, such as measuring program performance and informing future program design. The Department is interested in learning the extent to which others, particularly stakeholders at the State and local level, agree that this data is valuable for their own purposes and whether there is additional data that would be valuable for the Department to collect from its grantees?</i></p> <p><b>Director of FA:</b> Our opinion is that more than enough data is being requested. <i>(3) The Department is interested in reducing the burden of data collection and making use of existing data when at all possible. For example, are there alternative methods to collect data or data that is already collected on institutional expenditures related to HEER funding under section 18004a of the CARES Act?</i></p> <p><b>Director of FA:</b> FISAP or Fiscal Operations Report and Application to Participate <i>(4) Will the proposed method for collecting the number of FTE positions created or retained as a result of</i></p>	ED updated question 4 in the revised form to reflect our <a href="#">reporting notice published in the Federal Register</a> on August 31, which includes a footnote describing some of the acceptable methodologies an institution may use to report this number.

**Higher Education Emergency Relief (HEERF) Fund Recipient Data Collection Form  
Response to 60-Day Public Comments**

Document	Contact information	Comment	Response and Notes
		<p>HEER funds awarded to IHEs yield accurate data? Is there an alternative methodology that would improve the accuracy of the data?</p> <p><b>AVP for FS:</b> Those figures would have to come from HR or Payroll but there is a challenge, the system of record, PeopleSoft HR, has always had challenges with providing the FTE number for employees. I spoke with the director of payroll to confirm how we could pull the info. The main problem we would have is we can't get to that information specifically for 3/13. The system reports are as of whatever day you run them meaning we can't run a query now for 3/13. We do have a report as of 3/6 that we can use to get close but it won't be 3/13. The same would go for the end of reporting period date. If it is not a future date then we will have to use what data we have for that month.</p> <p>The other question I have would be around what types of positions would we include or exclude? Are you looking to include student worker positions? I'm concerned if they are sending this out nationally there may be numerous interpretations. The University System of Georgia has challenges with defining what FTE means for employees. My suggestion would be they need to define it for everyone a little more concisely otherwise it could be apples and oranges.</p> <p><b>Director of OGSP:</b> question #9 does not ask for the correct data to be able to determine created or retain positions. It would imply if the number for b is great than a, then we "created" positions which may be true but not necessarily because of the CARES Act funding. And if the number is the same, we "retained" positions but would that then imply that ALL positions were "retained"? I believe that you need to ask those questions specifically so that you get the data you need. I am not sure what the two numbers will be for the current questions but our institution was able to retain a number of positions because of the institutional portion of the CARES Act funding. And we would like you to know that.</p> <p>Example of a new #9:            9) Provide the full-time equivalent (FTE) positions for each of the following categories due to HEERF Amount Disbursed (18004(a)(1) Institutional Portion). FTE is defined as.....            a) Positions created _____            b) Positions retained _____</p> <p>Finally, when you say FTE do you only want the number of full-time positions or do you want all positions reported in the format of FTE. As an example, we retained three 40 hours/week positions, one 32 hours/week position, and seven 20 hours/week positions which would equal 7.25 FTEs even though they are actually 11 positions. Or would you just want us to only report the three 40 hours/week positions?</p>	<p>ED has revised the instructions for question 11 in the revised form to now read, "<i>The number of FTE positions includes all staff regardless of whether the position is funded by Federal, State, local, or other funds—and equals the sum of the number of full-time positions plus the full-time equivalent of the number of part-time positions.</i>" In addition, ED has updated question 11 in the revised form to include additional historical reporting dates. ED believes providing additional reporting dates will provide institutions with greater flexibility to report</p>

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Response to 60-Day Public Comments**

<b>Document</b>	<b>Contact information</b>	<b>Comment</b>	<b>Response and Notes</b>
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